

SENS

SEN : UNAUTHORIZED DISCHARGE

Mary Letzkus/R3/USEPA/US
05/28/2010 10:17 AM

To Ingrid Hopkins/R3/USEPA/US@EPA
cc
bcc
Subject Fw: Benning NPDES Permit - Use of Portable Oil/Water Separator

Ingrid,

FYI, Pepco has self reported this incident. Analytical results of PCB sampling were negative.

Mary

----- Forwarded by Mary Letzkus/R3/USEPA/US on 05/28/2010 10:12 AM -----



fmahvi@pepco.com
05/27/2010 05:11 PM

To Mary Letzkus/R3/USEPA/US@EPA
cc dycampbell@pepco.com
Subject Benning NPDES Permit - Use of Portable Oil/Water Separator

Hello Mary - Per our telephone conversation, here is a brief summary of the recent modification to the Plant Oil/Water Separator:

1. A metering potential transformer located on the roof of the Benning Generating Station failed due to a lightning strike. The transformer contained four quarts of PCB insulating fluid (greater than 500 PCB).
2. Under normal operating condition, roof drain along with process water from the Plant flows in a 24" diameter pipe to the Lift Station, is pumped over to an Oil/Water Separator (OWS), and is then discharged to internal monitoring point 201 (outfall 201).
3. When the incident occurred, the 24" diameter pipe, Lift Station and OWS were promptly taken out of service in accordance with the Plant's lock-out and tag-out procedure to prevent the discharge of PCB contaminated water to outfall 201. The 24" diameter pipe was plugged at the manhole by the plant and at the other end by the Lift Station.
4. Water from dirty water sumps and flood control sumps were rerouted to two Ash Tanks via hoses and pumps. Since no ash is generated or stored on-site, the Ash Tanks were cleaned several years ago and converted to its current use as water storage tanks .
5. The holding water in each Ash Tank was tested for PCB. The results were non-detectable.
6. Currently, water from the Ash Tank is pumped to a portable OWS supplied with activated carbon filters, and is then discharged to outfall 201.
7. PCB clean up is underway. The failed transformer was removed for disposal and replaced. Roofing material contaminated by the PCB fluid is being replaced. There is a plan to construct a new Lift Station and OWS. The portable OWS may remain in service until the construction of a new Lift Station and OWS is completed.

I'll keep you informed of the progress. Please contact me if you need any further information.

Regards,

Fariba Mahvi
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